

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

STRADLEY RONON STEVENS & YOUNG, LLP,	:	
	:	
Plaintiff,	:	C.A. No.
	:	
v.	:	
	:	
UNIVERSAL CAPITAL MANAGEMENT, INC.,	:	
	:	
Defendant.	:	

COMPLAINT

Plaintiff files this Complaint with the agreement of the Defendant to enter a judgment as more fully stated below.

1. Plaintiff, Stradley Ronon Stevens & Young, LLP (“Plaintiff”) is a Pennsylvania limited partnership with a principal place of business at 2600 One Commerce Square, Philadelphia, Pennsylvania 19103-7098. Plaintiff is a law firm.

2. Defendant, Universal Capital Management, Inc. (“Universal”) is a Delaware corporation with its principal place of business at 2601 Annand Drive, Suite 16, Wilmington, Delaware 19808.

3. This Court has jurisdiction pursuant to 28 U.S.C. § 1332, as the parties are citizens of different states and the amount in controversy, exclusive of interest and costs, exceeds the sum of \$75,000.

4. Venue is proper pursuant to 28 U.S.C. § 1391 in that, among other things, the principal place of business of Universal is in this judicial district.

5. Universal engaged Plaintiff to perform legal services for it from time to time.

6. Presently, there is a debt due from Universal to Plaintiff of at least \$166,129.07 for legal services performed by Plaintiff for Universal.

7. Universal has admitted that it owes to Plaintiff the sum of \$166,129.07 for legal services performed by Plaintiff.

8. Universal has agreed to an entry of judgment at this time in favor of Plaintiff and against Universal for the sum of \$166,129.07.

9. Universal has agreed to the entry of the Stipulated Order for Judgment that is filed contemporaneously herewith.

10. Plaintiff has not represented or otherwise provided counsel to Universal in any way relating to the aforementioned entry to judgment or the Stipulated Order for Judgment that is filed contemporaneously herewith.

WHEREFORE, Plaintiff demands that judgment be entered in the form of the Stipulated Order for Judgment, which is being filed contemporaneously herewith.

Dated: May 8, 2009

Respectfully Submitted,

/s/ Michael P. Migliore
Michael P. Migliore (Del. Bar #4331)
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